ATTACHMENT 1

OPERATION SUPPORT SYSTEMS ISSUES

SC Order ¶	LA Order ¶	FCC	BellSouth	AT&T
¶¶104, 105, 107	¶¶24-29	"In fact, according to the Department of Justice, 97 percent of BellSouth's residential orders and 81 percent of its business orders are processed without additional human intervention once the order is submitted by the BellSouth service representative." "The evidence in the record demonstrates that, in actual practice, the majority of orders submitted by competing carriers via the EDI interface do not mechanically flow through BellSouth's systems." "Moreover, the data show that these high rejection rates apply to all of the carriers using the EDI interface." "We believe that this substantial disparity between the flow-through rates of BellSouth's orders and those of competing carriers, on its face, demonstrates a lack of parity."		Paragraph added by AT&T. Only 34 percent of all CLEC EDI orders flow through BellSouth's systems without some degree of human intervention.

¶ 101-107	¶ 26-27	BellSouth does not notify competing carriers electronically that an order has been rejected due to errors.	Electronic reject notification implemented with EDI Version 7.0 on March 16, 1998.	EDI Version 7.0 is only a partial solution to the problem of untimely reject notices because it does not provide fully automated reject/error notices for all types of errors for all types of services and products. Based on BellSouth's performance data, it appears that fewer than 20 percent of rejection notices are fully automated. For other types of errors, the return of rejection notices still requires manual intervention. Moreover, BellSouth's performance data demonstrate that BellSouth is still taking, on average, about 2 days to send rejection notices -- a far cry from parity.
¶ 108-110	¶ 29-34	BellSouth does not provide credible evidence or explanation to substantiate its conclusions that reject errors are caused by competing carriers. Need further evidence as to causes of order errors to rule out that errors are caused from BellSouth's failure to provide information such as business rules.	Detailed analysis of orders is provided in BellSouth's service quality measurements (SQMs). See Stacy Performance Measurements Affidavit, Exhibit WNS-1.	BellSouth continues to provide no substantiation whatsoever for its allegations that reject errors are caused by CLECs. Rejections, in large part, are caused by the lack of inadequate system documentation, the lack of integratable interfaces, and the lack of electronic rejection notices.
¶ 111		BellSouth must provide competing carriers with business rules on how its internal systems and databases process an order submitted via the EDI interface so that they can reduce errors.	Business rules have been provided since April, 1997 in the Local Exchange Ordering Guide. Additionally, BellSouth provided LEO, LESOG, SOER rules on January 31, 1998. All rules for EDI Version 7.0 were also provided.	BellSouth has provided an initial distribution of the bulk of required information, but the rules contain numerous errors, omissions, and inconsistencies which continue to cause order rejections. BellSouth must update the information to correct these problems and to reflect changes in the interfaces. Moreover, BellSouth has not yet implemented and followed a proper change control process to provide timely notice of changes in business rules and other ordering documentation.

¶ 112		Lack of integration between BellSouth interfaces for preordering and ordering functions has contributed to competing carriers order reject problems. BellSouth has not provided information to allow new entrant to integrate BellSouth's preordering and ordering interfaces.	CGI specs have been provided. EC-LITE available as well. Third-party software has proven CGI-LENS and EDI-PC integration.	The LENS-CGI specifications will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The Commission has found that an integration method that involves a HTML presentation data stream would not provide nondiscriminatory access. Moreover, the "third-party software" cited by BellSouth is limited in scope, has not been shown to provide nondiscriminatory access, and likely requires manual intervention. The EC-Lite interface is not economically efficient at this time for many CLECs, particularly in view of the forthcoming implementation of BellSouth's integrated Application Program Interface ("API").
¶ 112	¶ 27	"We further find that the BellSouth's manual return of order rejection, notices has contributed to competing carriers error rates. BellSouth's manual process for returning order rejection notices requires new entrants to manually enter error information from the faxed notice into the EDI interface. BellSouth's failure to integrate order rejection notices into the EDI interface also can be reasonably expected to contribute to errors committed by new entrants."		Paragraph added by AT&T. EDI Version 7.0 does not provide fully automated reject/error notices for all types of errors for all types of services and products. Based on BellSouth's performance data, it appears that fewer than 20 percent of rejection notices are fully automated. For other types of errors, the return of rejection notices still requires manual intervention. Manual processes continue to cause costs, delays, and errors.
¶ 113		EDI-PC software does not provide adequate capability to check for errors before the order is submitted to BellSouth. BellSouth's retail systems include such order checking capabilities.	Additional edits were added to EDI-PC in Version 7.0 on March 16, 1998.	EDI-PC still does not have edit capabilities that are equivalent to the edit capabilities of RNS.

¶ 114		"At the very least, these high rejection rates are evidence that the systems BellSouth has deployed still require considerable improvement before they may be used in a manner that provides nondiscriminatory access to competing carriers."		Paragraph added by AT&T. Flow-through rates on EDI are even lower than at the time of the filing of BellSouth's previous applications. BellSouth's OSS will require considerable improvement to increase those rates. BellSouth's OSS are not sufficiently documented. BellSouth has not provided adequate specifications or business rules. Moreover, BellSouth has not implemented and followed a proper change management control process, and its software processes are immature.
¶ 118 & ¶ 120		Manual provision of order rejection notices via fax is not equivalent access to what BellSouth provides its retail operations.	Electronic reject notification implemented with EDI Version 7.0 on March 16, 1998. Data is provided on timeliness of error rejection notices.	EDI Version 7.0 is only a partial solution to the problem of untimely reject notices because it does not provide fully automated reject/error notices for all types of errors for all types of services and products. Based on BellSouth's performance data, it appears that fewer than 20 percent of rejection notices are fully automated. For other types of errors, the return of rejection notices still requires manual intervention. Moreover, BellSouth's performance data -- showing an average rejection interval of about 2 days -- demonstrate that BellSouth is still not providing rejection notices on a timely basis.
¶ 118	¶¶ 32-34	"[T]he evidence in the record indicates that BellSouth does not provide competing carriers with [order error and rejection] notices in a timely manner."		Paragraph added by AT&T. BellSouth's performance data -- showing an average rejection interval of about 2 days -- demonstrate that BellSouth is still not providing reject/error notices on a timely basis.

¶ 118	¶ 33	"BellSouth, on the other hand, has supplied us with no comparative data indicating how long it takes BellSouth to receive the equivalent of an error notice for its own orders." "However, there is evidence that BellSouth's retail operations, depending on where the error occurs in its systems, receive the equivalent of an error notice between a few seconds to thirty minutes after entering an order."		Paragraph added by AT&T. BellSouth still refuses to provide comparative data regarding its own retail operations, even though the testimony of its witnesses makes clear that BellSouth does receive the equivalent of an error notice in those operations. Nothing in BellSouth's application contradicts the Commission's prior finding that BellSouth provides itself the retail analogue of reject/error notices through its internal electronic interface immediately during order preparation and between a few seconds to thirty minutes after releasing an order to the Service Order Control System (SOCS).
¶ 122	¶¶ 35-38	"We also find that BellSouth is not providing firm order confirmation (FOC) notices on a timely basis." "The Commission concluded [in the Ameritech Michigan Order] that the BOC needs to provide FOC notices to competing carriers in substantially the same time and manner that its retail operations receive the retail analogue." Citing to Ameritech Michigan Order at para 187 n. 479. "Evidence in the record suggests that the appropriate retail analogue for a FOC would be the time that elapses between when an Ameritech order is placed into the legacy systems and when the order is recognized as a valid order by the legacy systems. We believe that the BOC performs the functional equivalent of a (FOC) for itself even if it does not do so in an identical manner." Ameritech Michigan Order at para 187 n. 479.		Paragraph added by AT&T. BellSouth has again failed to report comparative data on the time that elapses before it receives information equivalent to that in a FOC in its own retail operations, despite testimony of its own witnesses that it does receive such information. Moreover, CLECs still do not receive a large percentage of FOCs in substantially the same time as BellSouth receives the retail analogue. BellSouth obtains the retail analogue almost instantaneously. By contrast, the FOC performance data that BellSouth has provided suggest that BellSouth's overall average time for the return of FOCs is over one day for residential resale orders and over two days for business resale orders.

¶ 123		BellSouth's application does not provide data on timeliness of delivery of FOC notices to competing carriers. In Ameritech order FCC directed BOCs to provide such information in subsequent applications.	FOC interval data delivered as part of BellSouth's SQM See Stacy Performance Measurements Affidavit, Exhibit WNS-1.	The FOC performance data that BellSouth provided to AT&T suggest that BellSouth's overall average time for the return of FOCs is over one day for residential resale orders and over two days for business resale orders.
¶ 125 & ¶ 129		Because BellSouth failed to provide this data comparing times to deliver FOCs with BellSouth's retail operations, BellSouth has not provided evidence to demonstrate that it is providing nondiscriminatory access.	Data furnished for CLECs. BST does not generate FOCs for its retail units.	Despite evidence from its own witnesses that it receives the retail analogue of a FOC, BellSouth has again failed to report comparative data on the time it takes BellSouth to provide FOC-equivalent data to its own retail representatives.
	¶ 36	Need data on timeliness of delivery of FOC notices to competitive carriers and how long it takes to provide equivalent information to its retail operations. Need data for "numerous carriers over a specified period of time."	FOC interval data delivered as part of BST's SQM. See Stacy Performance Measurements Affidavit, Exhibit WNS-1. Data furnished for CLECs. BST does not generate FOCs for its retail units.	Despite evidence from its own witnesses that it receives the retail analogue of a FOC, BellSouth has again failed to report comparative data on the time it takes BellSouth to provide FOC-equivalent data to its own retail sales representatives.
¶ 131	¶ 40	Because BellSouth fails to provide order jeopardy notices for those delays caused by BellSouth, it is not providing competing carriers with nondiscriminatory access to OSS functions	BellSouth provides jeopardy notices (pending order status) electronically to LENS users and by fax to EDI users. Electronic notification for EDI users will be submitted to the CLEC/BellSouth Change Control Committee for development.	BellSouth has not changed its processes for providing CLECs with jeopardy notices for BellSouth-caused delays, despite the Commission's concerns. Service jeopardy notices for EDI orders still are transmitted manually. EDI is the ordering interface that BellSouth is relying on to demonstrate nondiscriminatory access. The process for providing jeopardy notices for LENS orders is irrelevant for Section 271 purposes because BellSouth is not relying on the LENS ordering interface to demonstrate nondiscriminatory access to ordering and provisioning functions.

¶ 137-139	¶ 44	FCC insists on data that will permit it to determine the average interval from when BellSouth first receives an order to when BellSouth sends an order completion notice to the competing carrier.	SQM measures supply the data in the format agreed to by the DOJ.	BellSouth's average completion interval measurement is ambiguously and inconsistently defined regarding the time when the measurement period begins. Moreover, contrary to the Commission's proposed definition, BellSouth has not included the time that may elapse between the actual order completion date and the time that it returns a completion notification to the CLEC. In any event, the data provided by BellSouth demonstrate that BellSouth is provisioning services more quickly for its own customers than for CLEC customers.
¶ 139		"[W]e expect BellSouth to provide information that shows it is providing competing carriers with timely receipt of order completion notices."		Paragraph added by AT&T. Although BellSouth proposes to report at some future time performance data showing its timeliness in providing notices of order completion to CLECs, it has provided no such data and claims that this measurement is "under development."
¶ 141		FCC does not base its decision on BellSouth's OSS functions for ordering and provisioning UNEs. BellSouth must demonstrate that it is offering nondiscriminatory access to OSS functions so as to enable competing carriers to submit orders for and obtain UNEs in a timely manner. For those OSS functions with no retail analogue, such as ordering and provisioning of UNEs, access to competing carriers must offer an efficient competitor a meaningful opportunity to compete.	Data for UNEs is presented in the SQM. See Stacy Performance Measurements Affidavit, Exhibit WNS-1.	CLECs' ability to order UNEs electronically is still very limited. Of the 67 BellSouth-offered UNE elements, CLECs can submit electronic orders for only five using EDI, and for eight others using EXACT.

¶ 142-43		"At the time of its application, BellSouth stated that no competing carriers were submitting orders for unbundled network elements through the EDI interface, although several carriers indicated their interest in using EDI. As competing carriers transition to EDI, BellSouth's preferred ordering interface, we are concerned that competing carriers may face the same problems with the EDI interface that carriers have experienced with orders for resale. These problems include high rejection rates and untimely order status notices." "We are also concerned about the level of manual processing involved in the ordering and provisioning of unbundled network elements."		Paragraph added by AT&T. CLECs' ability to order UNEs electronically is very limited. Of the 67 BellSouth-offered UNE elements, CLECs can submit electronic orders for only five using EDI, and for eight others using EXACT. Although BellSouth has provided no separate flow-through data for UNEs, BellSouth's performance data show that only 34 percent of all CLEC EDI orders flow through BellSouth's systems without some degree of human intervention.
¶ 144		BellSouth expected to provide a detailed explanation of the actions it has undertaken to transition to an automated process, and to demonstrate that it is able to process orders for and provision UNEs in a timely and accurate manner at both current and projected levels of demand from competing carriers.	Electronic ordering with electronic service order generation for loops, ports, interim number-portability (INP) and all available combinations listed in SGAT except loop distribution with NID available since November, 1997. Data for ordering and provisioning UNEs is presented in the SQM	CLECs' ability to order UNEs electronically is still very limited. Of the 67 BellSouth-offered UNE elements, CLECs can submit electronic orders for only five using EDI, and for eight others using EXACT.

145 & 146		"An additional concern is whether BellSouth has deployed the necessary OSS functions to allow competing carriers to order network elements in a manner that allows them to be combined." BellSouth, however, submits no evidence of its ability to provide OSS functions that support the ordering and provisioning of these combination of network elements." "BellSouth further indicates that is has not yet undertaken development of OSS that could process orders for combinations of network elements." "In addition, we are troubled by allegations in the record with respect to BellSouth's ability to coordinate orders for separate unbundled network elements so that a carrier may combine them."		Paragraph added by AT&T. CLECs' ability to order UNEs electronically is still very limited. Of the 67 BellSouth-offered UNE elements, CLECs can submit electronic orders for only five using EDI, and for eight others using EXACT. BellSouth acknowledges that it has not undertaken the systems development necessary for the ordering, provisioning, and billing of combinations of UNEs.
¶ 146		BellSouth expected to submit evidence to demonstrate that both individual UNEs and those elements that BellSouth offers in combination can be ordered and provisioned in an efficient, accurate and timely manner, and that its OSS are designed to accommodate both current and projected demand for UNEs and combinations of UNEs.	Electronic ordering with electronic service order generation for loops, ports, interim number-portability (INP) and all available combinations listed in SGAT except loop distribution with NID available since November, 1997. Data for ordering and provisioning UNEs is presented in the SQM. See Stacy Performance Measurements Affidavit, Exhibit WNS-1.	CLECs' ability to order UNEs electronically is still very limited. Of the 67 BellSouth-offered UNE elements, CLECs can submit electronic orders for only five using EDI, and for eight others using EXACT. BellSouth acknowledges that it has not undertaken the systems development necessary for the ordering, provisioning, and billing of combinations of UNEs.
¶ 155 & ¶ 161		BellSouth has not provided necessary technical specifications, such as updated and complete CGI specs.	Updated CGI specs provided December 15, 1997 and were further updated with EDI Version 7.0 released March 16, 1998.	The LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The Commission has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access.

¶ 162, 163	¶¶ 49, 53-55	"As for BellSouth's second proposed method for electronically connecting LENS to a new entrant's operations support systems -- development of a software program that utilizes the information underlying each LENS presentation screen -- we find convincing evidence in the record that use of this method would not provide equivalent access to OSS functions for pre-ordering." "[T]he competing carrier would only be able to download information from LENS one screen at a time, thereby resulting in a slower, less efficient process to connect LENS to the competing carrier's operations support systems that would be available through either CGI or a machine-to-machine interface." "[E]vidence in the record indicates that BellSouth has made changes to LENS that would impede the ability of a carrier to develop and use a software program to extract the data underlying each LENS screen." "[A] carrier that develops a software program to extract information from each LENS screen would to expend additional resources each time BellSouth makes a significant change in order to update the program to accommodate those changes."		Paragraph added by AT&T. The LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The Commission has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access.
¶ 164	¶ 54	"We further note that a number of parties also contend that BellSouth has not kept them adequately informed of changes to its OSS functions."		Paragraph added by AT&T. BellSouth has not yet implemented or established a change management process that provides CLECs with sufficient advance notice of changes. Indeed, BellSouth persistently makes changes to its systems that affect CLECs without adequate notice -- and, in numerous cases, with no advance notice at all.

166	¶ 55	New entrants using LENS cannot readily transfer information electronically from LENS to their OSS to integrate preordering and ordering systems. In contrast, BellSouth's retail operation uses an integrated preordering and ordering interface.	Integratable interfaces CGI and EC-LITE and EDI have been provided to the CLECs.	The LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The Commission has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. The EC-Lite interface probably is not economically efficient at this time for many CLECs, particularly in view of the forthcoming implementation of API.
	¶ 49	Competing carriers cannot readily connect electronically the LENS interface to their OSS or to the EDI interface. BellSouth's own retail operations use an integrated pre-ordering/ordering system.	Integratable interfaces CGI and EC-LITE and EDI have been provided to the CLECs.	The LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The Commission has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. The EC-Lite interface probably is not economically efficient at this time for many CLECs, particularly in view of the forthcoming implementation of API.
	¶ 54	BellSouth has not met its obligation to provide complete, detailed and updated specifications that competing carriers need to use CGI to electronically connect their OSS to BellSouth's interface.	Updated CGI specs provided December 15, 1997 and were further updated with EDI Version 7.0 released March 16, 1998.	The LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The Commission has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access.

¶ 167-168	¶ 57-58	The actual due date for orders is not assigned by LENS but rather after order goes through SOCS. Because of reject problems, new entrants cannot be confident that the due date they tell the customer will be the actual due date. The relevant CO or work center may no longer be accepting orders by time they get the order correct and get it through SOCS. Problem can be ameliorated by correcting the deficiencies in its ordering systems and by providing equivalent access to OSS functions through its current systems.	BST provided LEO, LESOG, SOER rules on January 31, 1998. All rules for EDI Version 7.0 were also provided. BellSouth provided LEO, LESOG, SOER rules on January 30, 1998. All rules for EDI version 7.0 were also provided, including provisioning intervals upon which due dates are based. LENS and EC-Lite access the same database for due date information as BellSouth's retail systems do. Electronic reject notification implemented with EDI Version 7.0 on March 16, 1998.	BellSouth's internal interfaces (RNS and SONGS) have the capability to calculate firm due dates. The LENS Inquiry Mode and EC-Lite interface still do not have the same capability. Several other factors compound the problems associated with the lack of a calculated due date, such as BellSouth's refusal to allow CLECs to reserve due dates, untimely FOCs, high reject rates, and inability to meet target intervals. For all of these reasons, it is nearly impossible for CLECs to offer its customers the same due dates with an equivalent level of confidence as BellSouth can offer to its customers.
¶ 170		FCC does not decide whether the method of calculating due date in LENS is discriminatory. However, BellSouth retail reps are provided with next available due dates that are automatically calculated while new entrants in inquiry mode of LENS are required to determine whether a premises visit is required and to calculate a due date manually.	Due date information is provided through LENS, LENS-CGI, and EC-LITE. Rules for the CLECs to incorporate calculations similar to RNS in these systems have been provided Additionally, the GA PSC has ordered due date calculation capability in LENS inquiry mode as it existed in LENS firm order mode, so BellSouth will add due date calculation to LENS inquiry mode as of November 1998.	BellSouth's internal interfaces (RNS and SONGS) have the capability to calculate firm due dates. The LENS Inquiry Mode and EC-Lite interface still do not have the same capability. Several other factors compound the problems associated with the lack of a calculated due date (e.g., no reserved due dates, untimely FOCs, high reject rates, and missed completion intervals). Consequently, it is nearly impossible for CLECs to offer its customers the same due dates with an equivalent level of confidence in that due date as BellSouth can offer to its customers. BellSouth has not provided rules for the CLEC to incorporate calculations similar to RNS in the LENS Inquiry Mode or in EC-Lite. The Georgia PSC has ordered BellSouth to provide a full due date calculation capability in the pre-ordering mode of LENS, without making any reference to the LENS firm order mode. BellSouth has not yet implemented the PSC's requirement.

¶¶ 171-72		"LENS in the [inquiry] mode requires a competing carrier to determine whether a premises visit is required and to calculate a due date manually. In contrast, BellSouth's retail service representatives are provided with next-available due dates that are automatically calculated based on the services on a particular order, the work that must be performed, and the availability of the work force for the area. Although BellSouth does not contest this apparent lack of parity in access to calculated due dates when LENS is used in the inquiry mode, BellSouth responds that competing carriers can obtain calculated due dates in the same manner as BellSouth representatives simply by using LENS in the firm order mode, rather than in the inquiry mode. A number of competing carriers contend to the contrary, arguing that the use of this mode for pre-ordering leads to several problems." "We note that BellSouth's retail operation does not face these same problems, because its pre-ordering and ordering functions are integrated."		Paragraph added by AT&T. BellSouth's internal interfaces (RNS and SONGS) have the capability to calculate firm due dates. The LENS inquiry mode and EC-Lite interface still do not have same capability.
¶ 173		FCC concerned about evidence in the record that BellSouth sent September 2, 1997 letter that describes a problem with LENS giving accurate due dates for some types of orders. No update has been sent.	Problem was corrected in November, 1997. CLECs were informed by their Account Teams.	Problem was apparently corrected as described by BellSouth. AT&T does not use the firm order mode of LENS.

¶ 174		FCC concerned by allegation that LENS user must scroll through lengthy list of available products and services and a random listing of numerous IXCs to find one.	P/SIMS download, CGI and EC-LITE are now available so CLECs can develop this capability. Also, the GA PSC has ordered a PIC search capability, which will require the JAVA feature in the Netscope browser, which BellSouth will add as of December 1998.	BellSouth's RNS has search capability for both product/features and PIC code lists. LENS does not have this capability. CLECs, moreover, cannot reasonably add this capability to the "LENS-CGI" specification because "LENS-CGI" uses a HTML presentation data stream. The LENS-CGI specification would require a CLEC to "call" BellSouth's database approximately 30 times to obtain the entire list of either product/features or PIC codes because the LENS-CGI specification only allows CLECs to obtain 10 entries at a time.
¶174		Multiple address validations required for each step of LENS inquiry mode.	Single address validation in new View All mode of LENS inquiry mode as of February 2, 1998.	The View All mode does not eliminate the lack of parity. To use View All, a CLEC must perform all of the pre-ordering functions of LENS, even if it does not actually need to perform all of them. Even with View All, users of LENS must go through multiple screens just to complete the pre-ordering process. BellSouth's retail operations are not subject to these requirements.
¶ 175		"In addition, the Department of Justice and several carriers contend, and the Florida Commission found, that a competing carrier using LENS in the inquiry mode must validate a customer's address prior to accessing each pre-ordering function."		Paragraph added by AT&T. LENS does not provide direct access to the desired pre-ordering function. In the "traditional" inquiry mode, CLECs must validate the address before performing each pre-ordering function. In View All and firm order mode, CLECs are tied to a sequential process. BellSouth does not provide CLECs with the capability to access any pre-ordering function in LENS in the order that suits the CLEC's business needs.

¶ 179		Limit of 100 numbers or 5% of numbers per central office should be removed.	Restriction was removed in January 1998.	BellSouth removed those restrictions after prolonged complaints by CLECs that this limit was discriminatory. BellSouth still limits CLECs using LENS to reserving 6 numbers at a time. By contrast, RNS allows BellSouth to reserve up to 25 telephone numbers at a time.
¶ 180		FCC notes CLECs' allegations that LENS locks up.	Problem was fixed with December 12, 1997 software release.	BellSouth has not demonstrated that LENS has adequate capacity because BellSouth's capacity claims, projected volumes and testing methodology are seriously flawed.
¶181		FCC encourages BellSouth to continue to work with competing carriers to ensure that LENS has adequate capacity.	LENS volume testing has continued. Support for 300 users is in production and additional capability is available.	BellSouth has not demonstrated that LENS has adequate capacity because BellSouth's capacity claims, projected volumes and testing methodology are seriously flawed.
*Other State PSCs OSS Issues		Processing N (new) and D (disconnect) orders instead of a C (change) order occasionally results in loss of dial tone.	The capability to process a single C order for simple orders was added on January 12, 1998. Complex C orders can be processed by CRIS as of March 13, 1998	BST added the capability to process a C order only after persistent complaints from AT&T, whose customers experienced disconnections in service during migration to AT&T as a result of the N and D order system.
*		LENS inquiry mode does not allow 30 day telephone number reservations comparable to RNS.	As of February 9, 1998. LENS inquiry mode allows 30-day telephone number reservations.	BST extended the reservation period only after AT&T and other CLECs pointed out the disparity between the preexisting nine-day period and the reservation period BellSouth's retail operations.
*		CLECs complained that they cannot reserve 25 telephone numbers via LENs as RNS allows.	LENS actually has unlimited telephone number reservation capability; CLECs may reserve 6 numbers at a time for an unlimited number of times in LENS.	Mr. Stacy has testified that CLECs using LENs may reserve 6 numbers at a time. BellSouth's retail operations, by contrast, can reserve up to 25 numbers at a time.

*		Questions raised about the status of BellSouth's Change Control Process	BellSouth's Change Control Process, with CLEC input, was formally introduced at a CLECs meeting on April 30, 1998, and is in effect as of May 15, 1998.	BellSouth has indicated that it regards the Change Control process as applicable only to CLEC-requested changes, not to changes sought by BellSouth. BellSouth has neither established nor followed a proper change control process.
*		BellSouth does not show retail pricing on CSR. (Customer-specific pricing is proprietary; retail rates are displayed in BellSouth's tariffs.)	The GA PSC ordered this, so as of Aug. 1998, BellSouth will display Georgia retail rates on the CSRs.	BellSouth still does not show retail pricing on the CSR on its interfaces for CLECs. The pricing is not proprietary, since it is published in tariffs and has been included in CSRs provided to CLECs by fax.
		BellSouth does not show an order summary screen in LENS. (EDI-PC does show an order summary screen.)	The GA PSC ordered this, so as of December 1998 BellSouth will provide an order summary screen in LENS.	BellSouth has not yet provided an order summary screen in LENS.
*		MCI requested a download of RSAG, in addition to the electronic access to RSAG BellSouth provides via LENS and EC-Lite.	The GA PSC ordered this, so as of September 1998, BellSouth will provide a nightly extract of the RSAG database to MCI.	Although AT&T's interconnection agreement with BellSouth requires BellSouth to provide a download of RSAG upon request, AT&T has not requested such a download to date.
*		BellSouth does not provide usage data for flat rate calls	The GA PSC ordered this, so as of December 1998, BellSouth will provide usage data for flat rate calls	BellSouth still does not provide usage data for flat rate calls, even though BellSouth uses such data and is required to provide such data to AT&T under the parties' interconnection agreement.

ATTACHMENT 2

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

Georgia Public Service Commission

47 TRINITY AVENUE, S.W.
ATLANTA, GEORGIA 30334-5701
(404) 656-4501 OR 1 (800) 282-5813
FAX: (404) 656-2341 www.psc.state.ga.us

Docket No. 8354-U

ORDER ADOPTING OSS REPORT

In re: Investigation into Development of Electronic Interfaces for BellSouth's Operations Support Systems

Record Submitted: March 20, 1998 Date Decided: April 21, 1998

APPEARANCES

On behalf of the Commission Staff:
Tiane Sommer, Special Assistant Attorney General
Stacey Ferris-Smith, Assistant Attorney General

On behalf of the Consumers' Utility Counsel:
Kennard Woods, Staff Attorney

On behalf of BellSouth Telecommunications, Inc.:
Fred McCallum, Attorney
William J. Ellenberg, Attorney
Lisa Spooner, Attorney

On behalf of American Communications Services of Columbus, Inc. and Cable Television Association of Georgia:
L. Craig Dowdy, Attorney
William Rice, Attorney

On behalf of AT&T Communications of the Southern States, Inc.:
David Eppsteiner, Attorney
Laureen McGurk Seeger, Attorney
Michael Hopkins, Attorney

On behalf of MCI Telecommunications Corporation:
Dulaney L. O'Roark, Attorney
David I. Adelman, Attorney
Richard Melson, Attorney

On behalf of Intermedia Communications, Inc.:
Patrick K. Wiggins, Attorney

On behalf of Sprint Communications Company, L.P.:
William Atkinson, Attorney
Carolyn Roddy, Attorney

On behalf of LCI International Telecom Corp.
Judith Holiber, Attorney

On behalf of MGC Communications, Inc.:
Peyton S. Hawes, Jr., Attorney
Marilyn Ash, Attorney

BY THE COMMISSION:

The Georgia Public Service Commission ("Commission") issues this Order regarding the operations support systems ("OSS") of BellSouth Telecommunications, Inc. ("BellSouth"). The Commission established this case to discuss and propose any necessary enhancements to BellSouth's operations support systems which will aid entry by competitive local exchange companies ("CLECs") into the local market, and to ensure that the systems meet the spirit and the intent of the Telecommunications Act of 1996.

In its October 30, 1997 Order in Docket No. 7253-U, the Commission directed the Staff to conduct a Technical Workshop and to subsequently submit a report to the Commission.[1] The Staff submitted the report on December 23, 1997 as directed by the Commission. BellSouth and intervenors expressed their positions regarding the Staff Report. As a result, the Commission decided to hold a hearing to determine whether to adopt the Staff Report, which was presented as GPSC Staff Exhibit 1 in the hearing, and attached as Appendix A to this Order.

I. JURISDICTION AND BACKGROUND

The federal Telecommunications Act of 1996, which amended the Communications Act of 1934, imposes various duties on incumbent local exchange

1 GPSC Docket No. 7253-U relates to the Commission's review of BellSouth's Statement of Generally Available Terms and Conditions pursuant to Section 252(f) of the Telecommunications Act of 1996. The Commission affirmed its directive, and made explicit reference to this docket, in its January 15, 1998 Order Regarding Revised Statement, Docket No. 7253-U, at p. 29 & n. 36.

companies ("LECs") to enable new competitors to enter the local market without necessarily having to build redundant physical networks. These duties include, among other things, the duties to provide new entrants with access to unbundled elements of the incumbents' networks, and to offer to new entrants at wholesale rates any telecommunications service provided by the incumbents on a retail basis. *See* 47 U.S.C. § 251(c)(3), (4).

Pursuant to Section 251 of the Act, 47 U.S.C. § 251, the Federal Communications Commission ("FCC") evaluated operations support systems in its *Local Competition First Report and Order*.[2] The FCC determined that, because OSS includes the information necessary to obtain other network elements or resold services, providing access to OSS functions falls squarely within an incumbent LEC's duty under Section 251(c)(3) to provide unbundled network elements under terms and conditions that are nondiscriminatory and just and reasonable, and its duty under Section 251(c)(4) to offer resale services without imposing any limitations or conditions that are discriminatory or unreasonable. The FCC additionally identified OSS itself as a network element and stated that it consists of five functions: (1) pre-ordering; (2) ordering; (3) provisioning; (4) maintenance and repair; and (5) billing.[3] For purposes of this docket, this Commission has considered some provisioning issues under the topic of ordering; other provisioning issues have been addressed in the Commission's separate proceeding on performance measurements, GPSC Docket No. 7892-U.

An incumbent LEC such as BellSouth uses OSS to provide services to its end user (retail) customers. The term OSS refers to the computer systems, databases, and personnel functions that incumbent LECs use for many internal operations necessary to provide service. Competitive LECs ("CLECs") must be able to access the incumbent's OSS in various ways. For example, CLECs must be able to access data necessary to sign up customers, to place orders for services or facilities provided by the incumbent, track the progress of that order to completion, receive relevant billing information from the incumbent, and obtain prompt repair and maintenance for the elements and services they obtain from the incumbent. CLECs must also be able to obtain the information and training necessary to make effective use of their access to the incumbents' OSS.

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2 *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd 15499 ("*Local Competition First Report and Order*"), *aff'd in part and vacated in part sub nom. Competitive Telecommunications Ass'n v. FCC*, 117 F.3d 1068 (8th Cir. 1997) and *Iowa Utilities Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *writ of mandamus issued sub nom. Iowa Utilities Bd. v. FCC*, No. 96-3321 (8th Cir. Jan. 22, 1998), *petition for cert. granted*, Nos. 97-826, 97-829, 97-830, 97-831, 97-1075, 97-1087, 97-1099, and 97-1141 (U.S. Jan. 26, 1998) (collectively, *Iowa Utils. Bd.*), Order on Reconsideration, 11 FCC Rcd 13042 (1996), Second Order on Reconsideration, 11 FCC Rcd 19738 (1996), Third Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 97-295 (rel. Aug. 18, 1997), *further recons. pending*.

3 *Local Competition First Report and Order*, 11 FCC Rcd at 15660-61, 15763, ¶¶ 316, 516-17; 47 C.F.R. § 51.319(f). The Eighth Circuit Court of Appeals upheld the FCC's determination that OSS is an unbundled network element. *Iowa Utilities Bd.*, 120 F.3d at 809.

The OSS functions include functions provided by the incumbent's databases, computer systems, and personnel. The databases contain information, such as the types of telecommunications services available to customers, address validation, telephone number availability, available dates for service installation, and other information necessary to formulate and process a customer's order for service. Various systems and databases have also been developed to resolve customer complaints about service, to handle maintenance and repair, and to ensure accurate and timely billing.

Georgia's Telecommunications and Competition Development Act of 1995 was a precursor to the federal requirements, and it also mandated opening the local exchange markets to competition with obligations imposed upon the incumbent LECs. Thus the Commission's actions in this docket also serve to meet relevant requirements in the Georgia Act. For example, all LECs must permit reasonable interconnection with other LECs; and this includes all or portions of such services as needed to provide local exchange services. O.C.G.A § 46-5-164(a). Such interconnection services shall be provided for intrastate services on an unbundled basis similar to that required by the FCC[4] for services under the FCC's jurisdiction. O.C.G.A § 46-5-164(d). Once the Commission has authorized resale of services (as in the case of BellSouth in Docket No. 6352-U), the Commission shall determine the reasonable conditions such that no LEC or telecommunications company gains an unfair market position. O.C.G.A § 46-5-164(e). The Commission has the authority to require LECs to provide additional interconnection services and unbundling. O.C.G.A § 46-5-164(g).

As evidenced in previous proceedings before this Commission,[5] BellSouth has already made progress in developing electronic interfaces for CLECs to access its OSS. The Commission recognizes that this is a substantial and evolutionary undertaking that is vital to the development of competition in Georgia's local exchange market. The Commission has not limited itself to a strict analysis or application of the so-called "parity" requirements of Sections 251 and 271 of the federal Act. The Commission does not intend that its decision in this docket be rigidly applied as part of any determination whether BellSouth has met particular requirements of Sections 251 and 271. Instead, the Commission in this docket has focused upon the practical aspects of meeting the spirit and intent of the Act in general, and in particular the identification of any necessary enhancements to BellSouth's OSS which will aid entry by CLECs into the local market.

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4 The Commission notes that the FCC has established a proceeding that includes OSS issues, *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, RM-9101. The FCC recently issued a Notice of Proposed Rulemaking in that proceeding (adopted April 16, 1998, released April 17, 1998).

5 *See* GPSC Docket No. 6352-U (discounts for resale of BellSouth services), wherein the parties and the Commission initially addressed electronic interfaces for access to OSS relevant to resale; and the consolidated Dockets No. 6863-U/7253-U (relating to BellSouth's potential application for Section 271 interLATA authority, and BellSouth's Statement of Generally Available Terms and Conditions, respectively). *See also* GPSC Docket No. 7061-U (setting cost-based rates for BellSouth's interconnection and unbundled network elements and related items, including use of OSS), and Docket No. 7892-U (regarding performance measurements for BellSouth).

II. STATEMENT OF PROCEEDINGS

The Commission established this proceeding by its October 30, 1997 Interim Order in Docket No. 7253-U. The Staff issued the first Notice of Technical Workshop Schedule on November 14, 1997, which was sent by first-class mail and where possible by facsimile to the parties in GPSC Dockets No. 6863-U/7253-U (Section 271 & SGAT), 7061-U (interconnection and unbundled network elements cost proceeding), and 7892-U (performance standards docket). The schedule set November 20, 1997 as the date for technical comments by companies such as CLECs having an interest in using BellSouth's electronic interfaces in Georgia; December 2, 1997 as the date for BellSouth's response; and December 9-10 as the dates for the Technical Workshop.

The following parties filed comments on November 20, 1997: American Communications Services, Inc. ("ACSI"), AT&T Communications of the Southern States, Inc. ("AT&T"), Intermedia Communications, Inc. ("ICI"), LCI International Telecom Corp. and its affiliates ("LCI"), MCI Telecommunications, Inc. ("MCI"), and Sprint Communications Company, L.P. ("Sprint"). On December 2, 1997, BellSouth filed a set of responses to the technical issues raised in the prefiled comments. On December 4, 1997, the Staff issued a detailed Agenda Notice for the Technical Workshop with an attached Matrix summarizing the technical issues raised in the prefiled comments. This Agenda Notice with Matrix was sent to those parties who prefiled comments and intervention notices in this docket, and to all persons who received the original Notice of the Technical Workshop. The workshop was held on December 9-10, 1997, in the hearing room of the Commission's offices, Room 507-E, at 47 Trinity Avenue in Atlanta.

The Staff prepared a Matrix of the technical issues based upon the prefiled comments, and this Matrix formed the foundation and format for the workshop discussions, proposed solutions, and proposed implementation dates. The Matrix grouped the issues into the following five topic categories:

Topic Number 1:	Pre-Ordering
Topic Number 2:	Maintenance and Repair
Topic Number 3:	Ordering & Provisioning
Topic Number 4:	Billing
Topic Number 5:	General (including provision of information and training)

The Staff subsequently filed its Report regarding the OSS Technical Workshop on December 23, 1997, including in the Matrix format both proposed solutions and implementation time frames for the issues within these five topics. As part of the recommendations contained in the Report, the Staff requested that the Commission consider accepting the Staff Report and its proposed procedures at its Administrative Session on January 20, 1998. Pursuant to the recommended procedures, BellSouth filed its responses to the Report on January 9, 1998, agreeing with many of the

recommendations but disagreeing or offering different implementation deadlines as to other aspects of the solutions proposed in the Staff Report. BellSouth filed a revised response on January 14, 1998. AT&T filed a response to the Staff Report on January 13, 1998. On January 20, 1998, the Commission considered the Staff Report along with the comments filed by BellSouth and AT&T, and decided to establish a date for comments from other interested parties. Pursuant to the Commission's Order setting January 27, 1998 as a date for objections to the Staff Report, additional responses were filed on that date by ACSI, BellSouth, Intermedia, MCI, and Sprint.

On February 6, 1998, the Commission issued a Procedural and Scheduling Order establishing a hearing process through which to resolve certain matters pertaining to the provision by BellSouth of access to its Operations Support System for CLECs, and specifically, whether to adopt the recommendations presented in the Staff Report. The Commission also ordered that a pre-hearing conference be conducted by Hearing Officer Philip J. Smith of the Commission Staff on February 13, 1998 in the Commission's hearing room. The purpose of the pre-hearing conference was to determine whether the number of issues identified by the Commission Staff in its Report could be pared.

Pursuant to the Commission's directive, the Hearing Officer conducted the pre-hearing conference and filed the results on February 16, 1998. The following parties were recognized as having intervened ACSI, AT&T, BellSouth, the Consumers' Utility Counsel Division of the Governor's Office of Consumer Affairs ("CUC"), ICI, LCI, Low Tech Designs, Inc. ("LTD"), MCI, MGC Communications ("MGC"), NEXTLink, Powertel, and Sprint. The Commission Staff also participated in the case, including th pre-hearing conference.

The pre-hearing conference showed that most of the issues identified by the Commission Staff, and the solutions and implementation time frames proposed by the Commission Staff, remained as issues for at least some of the parties. Some of the parties at the pre-hearing conference indicated dissatisfaction with the proposed solutions recommended by the Staff or with the alternative solutions, where applicable, proposed by BellSouth. No party objected to this scope of the issues for the hearings scheduled March 18-19, 1998.

On March 5, 1998, the Commission issued a Supplemental Procedural and Scheduling Order altering the schedule to include two additional days of March 20 and 23, 1998. The hearing was held March 18-20, 1998. Briefs were filed by the Commission Staff and the parties on March 30, 1998.

III. DISCUSSION OF THE ITEMS BELLSOUTH CHALLENGED

The Commission Staff presented the Staff Report and testified that the recommendations contained therein were based upon industry consensus where possible. Where there was no apparent consensus, the Staff developed reasonable compromises based upon the Staff's professional judgment, taking into account the comments and

recommendations but disagreeing or offering different implementation deadlines as to other aspects of the solutions proposed in the Staff Report. BellSouth filed a revised response on January 14, 1998. AT&T filed a response to the Staff Report on January 13, 1998. On January 20, 1998, the Commission considered the Staff Report along with the comments filed by BellSouth and AT&T, and decided to establish a date for comments from other interested parties. Pursuant to the Commission's Order setting January 27, 1998 as a date for objections to the Staff Report, additional responses were filed on that date by ACSI, BellSouth, Intermedia, MCI, and Sprint.

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